

Paul A. Pagano, Esq.  
Paul@LawOfficePaulPagano.com  
(917)589-1479

Law Office of Paul A. Pagano, P.C.



January 5, 2024

**VIA ECF**

The Honorable Stewart D. Aaron  
United States District Court  
Southern District of New York  
500 Pearl Street, Courtroom 11C  
New York, NY 10007  
Aaron\_NYSDChambers@nysd.uscourts.gov

Re: *Malcolm v. The City of New York*  
20-cv-09641(ALC)

Dear Judge Aaron:

This letter is submitted on behalf of the parties to respectfully request that the forthcoming January 12, 2024 deadline to file a case management plan and the forthcoming January 19, 2024 initial pre-trial conference be canceled in light of the parties' settlement.

On November 11, 2023, the Honorable Andrew L. Carter, Jr granted the parties' request to extend the deadline to submit a case management plan until January 12, 2024. Docket Entry ("D.E.") 150. On December 4, 2023, Your Honor issued an order setting down an initial pre-trial conference for January 19, 2024. D.E. 152. On December 12, 2023, the parties took part in a day long mediation with Darren Rumack, Esq. at the conclusion of which the parties' reached an agreement on the material terms of the settlement. In light of same we respectfully request that the Court cancel the January 12<sup>th</sup> deadline and the January 19<sup>th</sup> conference.

Given the recent holiday season, pre-scheduled vacation for counsel in January, and the anticipated depth and complexity of both the settlement agreement and approval motion, the parties seek to submit a formal settlement agreement and approval motion to the Honorable Andrew L. Carter, Jr. by March 1, 2024.

The parties thank Your Honor for his consideration of their foregoing requests.

Respectfully submitted,  
Law Office of Paul A. Pagano, P.C.

By: Paul Pagano  
Paul A. Pagano, Esq.  
*Attorneys for Plaintiffs*  
100 Duffy Street, Suite 510  
Hicksville, NY 11801  
(917) 589-1479

cc: All Counsel of Record (VIA ECF)